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Attorney for Defendant
KAREN BREDICE

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. CR S-03-148 GEB
CALIFORNIA,)	
)	STIPULATION TO CONTINUE
Plaintiff,)	STATUS CONFERENCE
)	
V.)	
)	
KAREN BREDICE,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and Gilbert R. Geilim, Esq., counsel for KAREN BREDICE and McGregor W. Scott, United States Attorney, and Dan Lindhardt, Assistant United States Attorney, counsel for the United States of America, that Status Conference in the above-captioned matter set for Friday, November 18, 2005, at the hour of 9:00 A.M., be vacated and continued to Friday, January 20, 2006, or a date that is convenient to the court.

This Stipulation is entered into for the following reasons:

1. Further time for investigation is needed.
2. Counsel is engaged in a felony trial in the Superior Court of California, Compton Judicial District, case entitled PEOPLE V. LEONARDO SERRANO, Case Number: NA069008.

STIPULATION TO CONTINUE STATUS CONFERENCE

1 3. On August 22, 2005 the Court signed an order granting
2 Subpoena Duces Tecum under Rule 17 (C). As a result of this
3 new disclosure, boxes of medical files were delivered to the FBI
4 offices in Los Angeles. The many files are in the process of
5 being reviewed and are pertinent to the defense of this case.
6 given the voluminous number of files, further time is needed to
7 complete this investigation.

8 4. Further, Defense Counsel believes that failure to grant
9 the continuance would result in a miscarriage of justice because
10 they have been conducting and will continue to conduct their own
11 investigation into the facts of this case and underlying
12 defenses, and need additional time to develop the facts and
13 prepare for trial.

14 5. The government does not object to a continuance of the
15 trial.

16 6. Based on the above-stated findings, the ends of justice
17 served by continuing the case as requested outweigh the interest
18 of the public and the defendants in a trial within the original
19 dates prescribed by the Speedy Trial Act.

20 7. For the purpose of computing time under the Speedy
21 Trial Act, 18 U.S.C. § 3161, et seq., within which trial must
22 commence, the time period of November to January, is deemed
23 excludable pursuant to 18 U.S.C. § 3161 (h)(8)(A) because it
24 results from a continuance granted by the judge at the
25 defendants' request without government objection on the basis of
26 the judge's finding that the ends of justice served by taking
27 such action outweigh the best interest of the public and
28 defendant in a speedy trial.

